

406. The allegations contained in paragraph 406 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 406 of the plaintiff's complaint.

407. The allegations contained in paragraph 407 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 407 of the plaintiff's complaint.

408. The allegations contained in paragraph 408 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 408 of the plaintiff's complaint.

409. The defendants admit the allegations contained in the first sentence of paragraph 409. The defendants neither admit nor deny the allegations contained in the second sentence of paragraph 409 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof. They defendants admit the balance of the allegations contained in paragraph 409 of the plaintiff's complaint.

410. The allegations contained in paragraph 410 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 410 of the plaintiff's complaint.

411. The defendants say that they need not respond to the allegations contained in paragraph 411 of the plaintiff's complaint as the document speaks for itself.

412. The defendants admit the allegations that a visual inspection of the plaintiff's property was made by members of the planning board. The defendants deny the allegations contained in the first sentence of paragraph 412 of the plaintiff's complaint.

413. The defendants admit the allegations contained in paragraph 413 of the plaintiff's complaint.

414. The defendants deny the allegations contained in paragraph 414 of the plaintiff's complaint.

415. The allegations contained in paragraph 415 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 415 of the plaintiff's complaint.

416. The allegations contained in paragraph 416 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 416 of the plaintiff's complaint.

417. The allegations contained in paragraph 417 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 417 of the plaintiff's complaint.

418. The defendants say that they need not respond to the allegations contained in paragraph 418 of the plaintiff's complaint as the document speaks for itself. In further answering, the defendants state that the allegations contained in paragraph 418 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 418 of the plaintiff's complaint.

419. The defendants say that they need not respond to the allegations contained in paragraph 419 of the plaintiff's complaint as the document speaks for itself. In further answering, the defendants state that the allegations contained in paragraph 418 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants neither admit nor deny the allegations

contained in paragraph 419 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

420. The defendants say that they need not respond to the allegations contained in paragraph 420 of the plaintiff's complaint as the document speaks for itself. In further answering, the defendants state that the allegations contained in paragraph 420 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants neither admit nor deny the allegations contained in paragraph 420 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

421. The defendants say that they need not respond to the allegations contained in paragraph 421 of the plaintiff's complaint as the document speaks for itself. In further answering, the defendants state that the allegations contained in paragraph 421 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 421 of the plaintiff's complaint.

422. The defendants admit the allegation that written notice was not sent. The defendants deny the balance of the allegations in paragraph 422 of the plaintiff's complaint. In further answering, the defendants state that the failure to send written notice and the effect of same on the subject of the upcoming trial in Hampden County Superior Court.

423. The defendants neither admit nor deny the allegations contained paragraph 423 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

424. The defendants deny the allegations contained in the first sentence of paragraph 424 of the plaintiff's complaint.

425. The defendants say that they need not respond to the allegations contained in paragraph 425 of the plaintiff's complaint as the document speaks for itself.

426. The defendants state that the allegations contained in paragraph 426 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 426 of the plaintiff's complaint.

427. The defendants state that the allegations contained in paragraph 427 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 427 of the plaintiff's complaint.

428. The defendants neither admit nor deny the allegations contained in paragraph 428 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

429. The defendants state that the allegations contained in paragraph 429 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 429 of the plaintiff's complaint.

430. The defendants neither admit nor deny the allegations contained in paragraph 430 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

431. The defendants neither admit nor deny the allegations contained in paragraph 431 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof. To the extent paragraph 431 alleges wrongdoing on the part of the planning board, the defendants deny the same.

432. The defendants neither admit nor deny the allegations contained in paragraph 432 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

433. The defendants neither admit nor deny the allegations contained in paragraph 433 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

434. The defendants state that the allegations contained in paragraph 434 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants neither admit nor deny that the plaintiff submitted a new proposal in good faith. In further answering, the defendants state that the document speaks for itself.

435. The defendants say that they need not respond to the allegations contained in paragraph 435 of the plaintiff's complaint as the document speaks for itself.

436. The defendants state that the allegations contained in paragraph 436 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 436 of the plaintiff's complaint.

437. The defendants state that the allegations contained in paragraph 437 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 437 of the plaintiff's complaint.

438. The defendants state that the allegations contained in paragraph 438 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 438 of the plaintiff's complaint.

439. The defendants state that the allegations contained in paragraph 439 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 439 of the plaintiff's complaint.

440. The defendants say that they need not respond to the allegations contained in paragraph 440 of the plaintiff's complaint as the document speaks for itself.

441. The defendants state that the allegations contained in paragraph 441 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 441 of the plaintiff's complaint. In further answering, the defendants state the language contained in M.G.L. c. 41, § 81P speaks for itself.

442. The defendants state that the allegations contained in paragraph 442 of the plaintiff's complaint call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 442 of the plaintiff's complaint. In further answering, the defendants state that whether or not there was commitment approved of the by plaintiff's ANR is the subject of the

Hampden County Superior Court trial which is currently under advisement before the Honorable Josephson, B., J.

443. The defendants deny the allegations contained in paragraph 443 that the planning board failed to take a vote. The defendants admit that the planning board failed to send written notice of its determination. The defendants state that the requirement of M.G.L. c. 41, § 81P as alleged in paragraph 443 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 443 of the plaintiff's complaint.

444. The defendants neither admit nor deny the allegations contained in paragraph 444 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

445. The defendants deny the allegations contained in paragraph 445 of the plaintiff's complaint.

446. The defendants admit the allegations contained in paragraph 446 of the plaintiff's complaint.

447. The defendants admit so much of the allegations in paragraph 447 as assert that the plaintiff informed the Board that he would file a Superior Court lawsuit. The defendants neither admit nor deny the balance of the allegations contained in paragraph 447 as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

448. The defendants deny the allegations contained in the first sentence of paragraph 448 of the plaintiff's complaint. The defendants admit the allegations contained in the second sentence of paragraph 448 of the plaintiff's complaint.

449. The defendants deny the allegations contained in the first sentence of paragraph 449 of the plaintiff's complaint. The allegations contained in the second sentence of paragraph 449 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in of paragraph 449 of the plaintiff's complaint.

450. The allegations contained in paragraph 450 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in of paragraph 450 of the plaintiff's complaint.

451. The allegations contained in the second sentence of paragraph 451 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants admit that Summons and Complaint were served on the Town of Holland.

452. The defendants neither admit nor deny the allegations contained in the first and second sentences of paragraph 452 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof. The defendants deny the remaining allegations contained in paragraph 452 of the plaintiff's complaint.

453. The allegations contained in paragraph 453 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in of paragraph 453 of the plaintiff's complaint.

454. The defendants deny the allegations contained in of paragraph 454 of the plaintiff's complaint that the speeding ticket was unjustified. The defendants neither admit nor deny the balance of the allegations contained in paragraph 454 of the plaintiff's complaint as

they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

455. The defendants say that they need not respond to the allegations contained in paragraph 455 of the plaintiff's complaint as the document speaks for itself.

456. The defendants admit the allegations contained in paragraph 456 that the planning board mailed a notice of decision. The defendants neither admit nor deny the balance of the allegations contained in paragraph 456 as they call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in of paragraph 456 of the plaintiff's complaint.

457. The defendants neither admit nor deny the allegations contained in the first and second sentences of paragraph 457 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

458. The defendants say that they need not respond to the allegations contained in paragraph 458 of the plaintiff's complaint as the document speaks for itself.

459. The defendants say that they need not respond to the allegations contained in paragraph 459 of the plaintiff's complaint as the document speaks for itself.

460. The defendants say that they need not respond to the allegations contained in paragraph 460 of the plaintiff's complaint as the document speaks for itself.

461. The defendants admit so much of the allegations contained in paragraph 461 as assert that Attorney McCaughey sent a letter dated December 18, 2002 to the plaintiff. The defendants deny the balance of the allegations contained in paragraph 461 of the plaintiff's complaint.

462. The defendants admit the allegations contained in paragraph 462 that the plaintiff sent defendant, McCaughey, a letter in response to McCaughey's letter to plaintiff dated December 18, 2002. The defendants deny the balance of the allegations contained in paragraph 462 of the plaintiff's complaint.

463. The defendants admit that May and Johnson were deposed by plaintiff on December 30, 2002. The defendants deny the allegations in paragraph 463 that defendant, Benveniste, ignored the notice of deposition. The defendants admit the allegations contained in paragraph 463 that Benveniste had testified at her deposition that she had to work that on December 30, 2002.

464. The defendants admit so much of the allegations contained in paragraph 464 of the plaintiff's complaint that Attorney McCaughey represented Earl Johnson who was a member of the PBH and a Town Selectman at his deposition and deny the balance of the allegations contained in paragraph 464 of the plaintiff's complaint.

465. The allegations contained in paragraph 465 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in of paragraph 465 of the plaintiff's complaint.

466. The defendants deny the allegations contained in of paragraph 466 of the plaintiff's complaint.

467. The defendants admit the allegation contained in paragraph 467 that Benveniste sent a letter to plaintiff dated December 22, 2003 stating that a written notice of the plaintiff's first ANR was never mailed. The defendants deny the balance of the allegations contained in paragraph 467.

468. The defendants deny the allegations contained in of paragraph 468 of the plaintiff's complaint.

469. To the extent that paragraph 469 refers to the deposition of Earl Johnson, the defendants neither admit nor deny as the plaintiff has not alleged a date for the deposition. Further answering, the defendants admit that Johnson was deposed by the plaintiff.

470. The defendants say that they need not respond to the allegations contained in paragraph 470 of the plaintiff's complaint as the document speaks for itself.

471. The defendants deny the allegations contained in the first sentence of paragraph 471 of the plaintiff's complaint. The defendants neither admit nor deny the remaining allegations contained in paragraph 471 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

472. The defendants admit as to all allegations contained in paragraph 472 except for the date. The defendants neither admit nor deny the date the allegation contained in paragraph 472 occurred as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

473. The defendants deny the allegations contained in paragraph 473 of the plaintiff's complaint.

474. The defendants neither admit nor deny the allegations contained in paragraph 474 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof. To the extent paragraph 474 alleges any wrongdoing on the part of the defendants, deny the same.

475. The defendants deny the allegations contained in paragraph 475 of the plaintiff's complaint.

476. The defendants deny the allegations contained in paragraph 476 of the plaintiff's complaint.

477. The defendants admit the allegations contained in paragraph 477 of the plaintiff's complaint. To the extent paragraph 477 alleges any wrongdoing on the part of the defendants, the defendants deny.

478. The defendants neither admit nor deny the allegations contained in paragraph 478 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

479. The defendants deny the allegations contained in paragraph 479 of the plaintiff's complaint.

480. The defendants neither admit nor deny the allegations contained in paragraph 480 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

481. The defendants say that they need not respond to the allegations contained in paragraph 481 of the plaintiff's complaint as the document speaks for itself.

482. The defendants deny the allegations contained in paragraph 482 of the plaintiff's complaint.

483. The defendants deny the allegations contained in paragraph 483 of the plaintiff's complaint.

484. The defendants admit that defendants produced documents pursuant to a discovery request. Further answering, the defendants neither admit nor deny the allegations as to specific documents produced as said documents speak for themselves.

485. The defendants neither admit nor deny the allegations contained in paragraph 485 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

486. The defendants neither admit nor deny the allegations contained in paragraph 486 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

487. The defendants say that they need not respond to so much of the allegations in paragraph 487 of the plaintiff's complaint as allege the contents of the deposition transcript. The defendants deny the balance of the allegations contained in paragraph 487 of the plaintiff's complaint.

488. The defendants admit the allegations contained in paragraph 488 that the plaintiff raised his awareness of the rule. The defendants deny the balance of the allegations contained in paragraph 488 of the plaintiff's complaint.

489. The defendants deny the allegations contained in paragraph 489 of the plaintiff's complaint.

490. The defendants deny the allegations contained in paragraph 490 of the plaintiff's complaint.

491. The defendants admit to the allegation contained in paragraph 491 that the defendant, Ford, has moved to Connecticut. The defendants deny the balance of the allegations contained in paragraph 491 of the plaintiff's complaint.

492. The defendants admit the allegations contained in paragraph 492 of the plaintiff's complaint.

493. The defendants deny the allegations contained in the first sentence of paragraph 493 of the plaintiff's complaint. The defendants admit that Benveniste testified that the PBH voted on the first ANR plan when, in fact, a vote was not taken at the July 2, 2002 planning board meeting.

494. The defendants deny the allegations contained in the first sentence of paragraph 494 of the plaintiff's complaint that Benveniste engaged in perjury during her deposition. The defendants admit the balance of the allegations contained in paragraph 494.

495. The defendants neither admit nor deny the allegations contained in paragraph 495 of the plaintiff's complaint as the document speaks for itself.

496. The defendants deny the allegations contained in paragraph 496 of the plaintiff's complaint.

497. The defendants admit the allegations contained in the first sentence of paragraph 497 of the plaintiff's complaint. The defendants deny the balance of the allegations contained in paragraph 497 of the plaintiff's complaint.

498. The defendants deny the allegations contained in paragraph 498 of the plaintiff's complaint.

499. The defendants admit the allegations contained in the first sentence of paragraph 499 of the plaintiff's complaint. The defendants deny the balance of the allegations contained in paragraph 499 of the plaintiff's complaint.

500. The defendants deny the allegations contained in paragraph 500 of the plaintiff's complaint.

501. The defendants admit the allegations contained in the first sentence of paragraph 501 of the plaintiff's complaint. The defendants deny the balance of the allegations contained in paragraph 501 of the plaintiff's complaint.

502. The defendants say that they need not respond to the allegations contained in paragraph 502 of the plaintiff's complaint as the document speaks for itself. The defendants deny the allegations contained in paragraph 502 of the plaintiff's complaint that McCaughey deliberately stated facts wrong, known to him to be fake.

503. The allegations contained in paragraph 503 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 503 of the plaintiff's complaint.

504. The defendants say that they need not respond to the allegations contained in paragraph 504 of the plaintiff's complaint as the document speaks for itself.

505. The defendants deny the allegations contained in paragraph 505 of the plaintiff's complaint.

506. The defendants admit that the discussion alleged in paragraph 506 took place and that the parties could not agree to the application. To the extent any wrongdoing on the part of the defendants is alleged in paragraph 506, the defendants deny the same.

507. The defendants neither admit nor deny the allegations contained in paragraph 507 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

508. The defendants neither admit nor deny the allegations contained in paragraph 508 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

509. The defendants say that they need not respond to the allegations contained in paragraph 509 of the plaintiff's complaint as the document speaks for itself. To the extent that

paragraph 509 of the plaintiff's complaint alleges any wrongdoing on the part of the defendants, such wrongdoing is denied.

510. The defendants say that they need not respond to the allegations contained in paragraph 510 of the plaintiff's complaint as the document speaks for itself.

511. The defendants say that they need not respond to the allegations contained in paragraph 511 of the plaintiff's complaint as the document speaks for itself.

512. The defendants say that they need not respond to the allegations contained in paragraph 512 of the plaintiff's complaint as the document speaks for itself.

513. The defendants neither admit nor deny the allegations contained in paragraph 513 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

514. The defendants neither admit nor deny the allegations contained in paragraph 513 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

AS TO COUNT I

515. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 515 of the plaintiff's complaint and incorporate them herein by reference.

516. The defendants deny the allegations contained in paragraph 516 of the plaintiff's complaint.

517. The defendants deny the allegations contained in paragraph 517 of the plaintiff's complaint.

518. The defendants deny the allegations contained in paragraph 518 of the plaintiff's complaint.

519. The defendants deny the allegations contained in paragraph 519 of the plaintiff's complaint.

520. The defendants deny the allegations contained in paragraph 520 of the plaintiff's complaint.

521. The defendants deny the allegations contained in paragraph 521 of the plaintiff's complaint.

522. The defendants deny the allegations contained in paragraph 522 of the plaintiff's complaint.

523. The defendants deny the allegations contained in paragraph 523 of the plaintiff's complaint.

524. The defendants deny the allegations contained in paragraph 524 of the plaintiff's complaint.

525. The defendants deny the allegations contained in paragraph 525 of the plaintiff's complaint.

526. The defendants deny the allegations contained in paragraph 526 of the plaintiff's complaint.

527. The defendants deny the allegations contained in paragraph 527 of the plaintiff's complaint.

528. The defendants admit the allegations contained in paragraph 528 of the plaintiff's complaint. To the extent paragraph 528 alleges any wrongdoing, the defendants deny the allegations contained in paragraph 528 of the plaintiff's complaint.

529. The defendants deny the allegations contained in paragraph 529 of the plaintiff's complaint.

AS TO COUNT II

530. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 529 of the plaintiff's complaint and incorporate them herein by reference.

531. The defendants deny the allegations contained in paragraph 531 of the plaintiff's complaint.

532. The defendants deny the allegations contained in paragraph 532 of the plaintiff's complaint.

AS TO COUNT III

533. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 532 of the plaintiff's complaint and incorporate them herein by reference.

534. The defendants deny the allegations contained in paragraph 534 of the plaintiff's complaint.

535. The defendants deny the allegations contained in paragraph 535 of the plaintiff's complaint.

AS TO COUNT IV

536. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 535 of the plaintiff's complaint and incorporate them herein by reference.

537. The defendants deny the allegations contained in paragraph 537 of the plaintiff's complaint.

538. The defendants deny the allegations contained in paragraph 538 of the plaintiff's complaint.

539. The defendants deny the allegations contained in paragraph 539 of the plaintiff's complaint.

540. The defendants deny the allegations contained in paragraph 540 of the plaintiff's complaint.

541. The defendants deny the allegations contained in paragraph 541 of the plaintiff's complaint.

542. The defendants deny the allegations contained in paragraph 542 of the plaintiff's complaint.

543. The defendants deny the allegations contained in paragraph 543 of the plaintiff's complaint.

544. The defendants deny the allegations contained in paragraph 544 of the plaintiff's complaint.

545. The defendants deny the allegations contained in paragraph 545 of the plaintiff's complaint.

546. The defendants deny the allegations contained in paragraph 546 of the plaintiff's complaint.

547. The defendants deny the allegations contained in paragraph 547 of the plaintiff's complaint.

548. The defendants deny the allegations contained in paragraph 548 of the plaintiff's complaint.

549. The defendants deny the allegations contained in paragraph 549 of the plaintiff's complaint.

550. The defendants admit the allegations contained in paragraph 550 of the plaintiff's complaint. To the extent that paragraph 550 alleges any wrongdoing, the defendants deny the allegations contained in paragraph 550 of the plaintiff's complaint.

551. The defendants deny the allegations contained in paragraph 551 of the plaintiff's complaint.

AS TO COUNT V

552. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 551 of the plaintiff's complaint and incorporate them herein by reference.

553. The defendants deny the allegations contained in paragraph 553 of the plaintiff's complaint.

554. The defendants deny the allegations contained in paragraph 554 of the plaintiff's complaint.

555. The defendants deny the allegations contained in paragraph 555 of the plaintiff's complaint.

AS TO COUNT VI

556. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 555 of the plaintiff's complaint and incorporate them herein by reference.

557. The defendants deny the allegations contained in paragraph 556 of the plaintiff's complaint.

558. The defendants deny the allegations contained in paragraph 557 of the plaintiff's complaint.

559. The defendants deny the allegations contained in paragraph 558 of the plaintiff's complaint.